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IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

2008 MAR 26 A. 9:55

DEBRA P. HACKETT, CLK.
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

BOYKIN JONES 115033
Full name and prison number
of plaintiff(s)

v.

LEON FORNISS, WARDEN
NITKA SHAMBARY
ONTORUS PORTER #143912

CIVIL ACTION NO. 2:08CV220-MHT
(To be supplied by Clerk of
U.S. District Court)

Name of person(s) who violated
your constitutional rights.
(List the names of all the
persons.)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES () NO (☒)
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES () NO (☒)
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) _____

Defendant(s) _____

2. Court (if federal court, name the district; if state court, name the county) _____

3. Docket number _____
4. Name of judge to whom case was assigned _____
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) _____
6. Approximate date of filing lawsuit _____
7. Approximate date of disposition _____

II. PLACE OF PRESENT CONFINEMENT E.C.F 200 WALLACE DRIVE CLID AL 36017

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED STATION CORRECTIONAL FACILITY P.O. BOX 56 ELMORE, ALA. 36025

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

- | NAME | ADDRESS |
|--------------------|--|
| 1. LEON FORNISS | STATION CORR. FACILITY P.O. BOX 56, ELMORE, ALA. 36025 |
| 2. NITKA SHAMBAR | STATION CORR. FACILITY P.O. BOX 56, ELMORE, ALA. 36025 |
| 3. DONTORUS PORTER | E.C.F 200 WALLACE DRIVE CLID AL 36017 |
| 4. _____ | _____ |
| 5. _____ | _____ |
| 6. _____ | _____ |

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED 10-13-2007

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: SEE EXHIBIT (A)-(B)-(C) IS A STATEMENT OF CASE AND FACTS THAT THE PLAINTIFF

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

WERE UNDER IMMINENT DANGER OF SERIOUS PHYSICAL INJURY CAUSED BY DEFENDANT NURSE NITKA SHAMBAR. PLAINTIFF REPORTED TO DEFENDANT LEON FORNISS THE WARDEN HE FAIL TO INVESTIGATE DEFENDANT ONTOURUS PORTER COMMITTED PERJURY

GROUND TWO: BY NOT TELLING THE TRUE ABOUT WHAT HAPPEN. PLAINTIFF IS NOW STILL SUFFERING

SUPPORTING FACTS: PAIN AND MENTAL STRESS AND PUNITIVE DAMAGES.

GROUND THREE:

SUPPORTING FACTS:

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

PLAINTIFF REQUESTS THIS COURT TO BAR THEM FROM
THEIR JOBS FROM DEPARTMENT OF CORRECTION, AND FOR
HIS SERIOUS PHYSICAL INJURY HE REQUEST JUDGMENT AGAINST
THESE DEFENDANTS PUNITIVE DAMAGES IN THE AMOUNT OF \$500,000⁰⁰
AND FOR PAIN AND SUFFERING AND MENTAL STRESS, IN THE AMOUNT OF \$500,000⁰⁰

Baykin Jaffer
Signature of plaintiff(s)

I declare, under penalty of perjury that the foregoing is true and correct.

EXECUTED on 3-18-2008
(Date)

Baykin Jaffer
Signature of plaintiff(s)

To: Whom it may Concern:

My name is Boykin Jones an inmate at Istaton Correctional Facility in Elmore County. On the 10-13-07 I was called over to the health care unit for a Diabetic fingerstick it was three nurses present nurse Sander Nurse Jones and Nurse Shambray and officer Lewis and another inmate porter. I was confronted by nurse Sander that I had file a medical grievance on her for refusing to give me my medication after sticking my finger and receiving my dosage of insulin I drop a strip on the floor had blood on it. Nurse Sander told me to come back in the room and pick it up off the floor. When coming back in the room I was confronted by nurse Shambray by saying you wrote my friend up old white head man she had a scrape in her hand but it was still inside the pack. So when I bent down on one knee to pick up the strip nurse Shambray rush over while I was bent down and

(9)

EXHIBIT
B

on one knee Nurse Shandrew started kicking me on the side of my leg and feet and hitting me in my upper back with a cleave first as hard as she could officer Lewis was present and shouted out to nurse ~~Shandrew~~ Shandrew to stop well later that night around 9 p.m. my back and neck started aching real bad I reported the incident to Lt. Cooper which he ask when I wanted so late to repeat this. I told him officer Lewis was present and I thought he was going to report it. I was place in Leg's ending investigative and I stayed back up until twelve night at 10. PM after Lt. Copeland came to me and said I was lying and I need to drop it and later that day Capt. Robinson and Lt. Browning and Lt. Cooper call me out and said I was not telling the truth and to make serious allegation like that I will be dealt with. on the 10-18-07 I was call to the guard office by officer Jones when I

(3)
ExhibitC

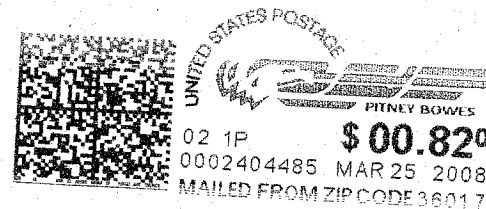
went inside I was told by Lt. Cooper that I was going to receive a write up for lying to a DOC official and I told them to give all of us a polygraph test to determine who is telling the truth that will prove my creditability because the three nurses and Officer Lewis and inmate porter said they did not see anything. And I don't have any witnesses in my behalf and it happen like I said it did and I need a lie detector test perform on all of us. I go up for parole next year and a write up will mess up my chances of making parole. please contact I and I to come and investigate this matter and perform a lie detector test on me.

Respectfully Submitted
Boykin Agnes
#115033

BOYKIN JONES
Ais 115033 Da-61-A
E.C.F.
200 WALLACE DRIVE
CLID AL 36017

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